

FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

JUN 07 2022

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DEPUTY
SPOKANE, WASHINGTON

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9 UNITED STATES DISTRICT COURT
10 FOR THE EASTERN DISTRICT OF WASHINGTON

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 JORGE OCTAVIO VALENZUELA-
15 MEDRANO,
16 STEVEN ALAN DAANEN,
17 TAWNEY LYNN MCKENZIE, and
18 COSME ANTHONY MEDRANO,

19 Defendants.

2:22-CR-00019-MKD

SECOND SUPERSEDING
INDICTMENT

Vio.: 21 U.S.C. § 841(a)(1),
(b)(1)(A)(viii)
Possession with Intent to
Distribute 500 Grams or More
of Methamphetamine
(Count 1)

21 U.S.C. §§ 841(a)(1),
(b)(1)(A)(viii), 846
Conspiracy to Distribute 500
Grams or More of
Methamphetamine
(Count 2)

21 U.S.C. § 853
Forfeiture Allegations

25 The Grand Jury charges:
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SECOND SUPERSEDING INDICTMENT-1

COUNT ONE

On or about January 27, 2022, in the Eastern District of Washington, the Defendant, JORGE OCTAVIO VALENZUELA-MEDRANO, knowingly possessed with the intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(viii).

COUNT TWO

On a date unknown, but by September 2020, and continuing to on or about January 27, 2022, in the Eastern District of Washington and elsewhere, the Defendants, JORGE OCTAVIO VALENZUELA-MEDRANO, STEVEN ALAN DAANEN, TAWNEY LYNN MCKENZIE, and COSME ANTHONY MEDRANO, and other individuals, both known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate and agree together with each other to commit the following offense: distribution of 500 grams or more of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii), 846.

NOTICE OF CRIMINAL FORFEITURE

The allegations contained in this Second Superseding Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures.

1 Pursuant to 21 U.S.C. § 853, upon conviction of an offense in violation of 21
2 U.S.C. § 841, as set forth in this Second Superseding Indictment, Defendants, JORGE
3 OCTAVIO VALENZUELA-MEDRANO, STEVEN ALAN DAANEN, TAWNEY
4 LYNN MCKENZIE, and COSME ANTHONY MEDRANO, shall forfeit to the
5 United States of America, any property constituting, or derived from, any proceeds
6 obtained, directly or indirectly, as the result of such offense and any property used or
7 intended to be used, in any manner or part, to commit or to facilitate the commission
8 of the offense. The property to be forfeited includes, but is not limited to:
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12 Defendant JORGE OCTAVIO VALENZUELA-MEDRANO (Counts 1 and 2)

13
14 \$30,920.00 U.S. currency seized by the United States Drug Administration
15 pursuant to the execution of a Federal Search and Seizure Warrant on or about
16 January 27, 2022.

17 Defendant STEVEN ALAN DAANEN (Count 1)

18
19 \$30,920.00 U.S. currency seized by the United States Drug Administration
20 pursuant to the execution of a Federal Search and Seizure Warrant on or about
21 January 27, 2022.

22 If any forfeitable property, as a result of any act or omission of the Defendants:

- 23
24 a. cannot be located upon the exercise of due diligence;
25 b. has been transferred or sold to, or deposited with, a third party;
26 c. has been placed beyond the jurisdiction of the court;
27 d. has been substantially diminished in value; or
28

1 e. has been commingled with other property which cannot be divided
2 without difficulty,
3 the United States of America shall be entitled to forfeiture of substitute property
4 pursuant to 21 U.S.C. § 853(p).
5

6 DATED this 7 day of June, 2022.

7 A TRUE BILL
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